

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RENEE YOWELL,

Defendant.

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Case No. 4:17CR00047 CEJ

**SENTENCING MEMORANDUM**

Comes now defendant Renee Yowell, by and through her attorney, and states to the Court as follows:

1. The defendant is scheduled for sentencing before this Honorable Court. The applicable sentencing statute, 18 U.S.C. §3553(a), assigns to this court the duty to impose a sentence that is sufficient, but not greater than necessary, to satisfy the statutory purposes of sentencing.

2. The defendant pleaded guilty to one count of Bank Fraud, under 18 U.S.C. Section 1344.

3. The pre-sentence investigation report prepared by the Department of Probation sets forth a sentencing calculation which places the defendant, at a total offense level of 7 and a criminal history category of 2. This equation sets the suggested range of punishment at 2 to 8 months.

4. Per Statute probation is not allowed.

5. The defendant respectfully requests that the Court, consistent with the aforementioned law, sentence the defendant to a sentence of one day, credit for time served, and place the defendant on a period of supervised release. For the following reasons, counsel believes that such a sentence is sufficient, but not greater than necessary, to satisfy the statutory purposes of sentencing.

a) Renee Yowell was only thirteen years old when her father went to prison for twenty years. Renee is an only child whose difficult adolescence was compounded by her mother marrying a registered sex offender who propositioned Renee when she was only seventeen years old. Renee's mother didn't believe the allegation, and shortly thereafter Renee moved out of the home, and began living with Scott Yowell, the man who later became her husband.

b) Renee and Scott fell into a cycle of drug abuse by using methamphetamine. They have both struggled with addiction for a number of years.

c) Renee moved with Scott to Indiana in 2006, where she obtained an Associate degree in computer technology. Renee graduated Cum Laude. This was a time in her life when she was doing fairly well.

d) Ultimately, Renee and Scott moved back to the Franklin County, Missouri area, where they both fell back into drug abuse.

e) Renee suffers from poor health, both physical and mental, requiring regular doctor care, and medication.

6. Renee has done well since being released to the supervision of Pre Trial services. She has participated in various types of treatment and has maintained sobriety.

7. Renee has been working steadily since her release, and possesses a valid driver's license.

WHEREFORE, counsel respectfully requests that the court enter an appropriate sentence by placing the defendant on supervised release after the imposition of a sentence of one day in jail, granting her credit for time served, and any other relief the Court deems appropriate, under the circumstances.

BY s/ Kenneth R. Schwartz  
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**PROOF OF SERVICE**

The undersigned certifies that the above was electronically filed this 18th day of July, 2017.

s/ Kenneth R. Schwartz